

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civ. No. 13-3003 (WMW/DTS)

United States of America,  
*ex rel.* Kipp Fesenmaier,

Plaintiffs,

v.

The Cameron-Ehlen Group, Inc.,  
Dba Precision Lens, and  
Paul Ehlen

Defendants.

**PLAINTIFFS' MOTION FOR  
JUDGMENT**

Consistent with the jury's verdict announced on February 27, 2023, Plaintiffs hereby move the Court to enter judgment in this matter against each Defendant, jointly and severally, in the amount of \$489,529,705.13 pursuant to the False Claims Act, 31 U.S.C. § 3729(a) (FCA). This amount represents treble damages and the minimum penalty per claim based on the statutory penalties during the Relevant Time Period.

Plaintiffs further move the Court to award post-judgment interest at the legal rate set by 28 U.S.C. § 1961(a), computed daily and compounded annually until the Government is paid in full.

This motion is based on the above-cited statutes and the accompanying memorandum of law.

Dated: March 17, 2023

ANN M. BILDTSSEN  
First Assistant United States Attorney  
*Attorney for the United States Acting*  
*Under Authority Conferred by*  
*28 U.S.C. § 515*

s/ Chad A. Blumenfield

CHAD A. BLUMENFIELD (#387296)  
BAHRAM SAMIE (#392645)  
ANDREW TWEETEN (#395190)  
Assistant United States Attorneys  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
(612) 664-5600

**Attorneys for Plaintiff**  
**United States of America**

Dated: March 17, 2023

Morgan Verkamp LLC

*s/ Jennifer M. Verkamp*

Jennifer M. Verkamp (OH 0067198)

Sonya A. Rao (MA 647170)

Chandra Napora (OH 0092886)

4410 Carver Woods Dr., Ste. 200

Cincinnati, Ohio 45242

Tel. (513) 651-4400

Fax (513) 651-4405

jverkamp@morganverkamp.com

sonya.rao@morganverkamp.com

c.napora@morganverkamp.com

**Attorneys for Plaintiff-Relator**

**Kipp Fesenmaier**